

E-rate Document Retention Requirements*

PRE-BIDDING PROCESS	
Library	Service Provider
Documentation granting E-rate applicant the authority to complete E-rate documents for the applying library	
Technology Plan	
Technology Plan Approval Letter	
Signed copies of all written agreements with E-rate consultants	

BIDDING PROCESS	
Library	Contracted Service Provider
Requests for Proposals (RFPs)	Any of the relevant documents described in the Library list on the left
Evidence of RFP publication date	A copy of the winning bid submitted to the applicant
Documents describing the bidding evaluation criteria and weighting	Any correspondence with the applicant and dated notes taken during conversations
Bid evaluation worksheets	
All written correspondence between the beneficiary and prospective bidders regarding the products and services sought	
All winning and losing bids submitted	
Documents related to the selection of service provider(s)	
All documents used during the competitive bidding process	

CONTRACTS	
Library	Service Provider
Executed contracts	Executed contracts
All amendments and addendums to the contracts	All amendments and addendums to the contracts
Any other agreements relating to E-rate between the beneficiary and service provider, such as up-front payment arrangements.	Any other agreements relating to E-rate between the beneficiary and service provider, such as up-front payment arrangements.

APPLICATION PROCESS	
Library	Service Provider
All documents relied upon to submit the Form 471	
National School Lunch Program eligibility documentation supporting the discount percentage sought	
Documents to support the necessary resources certifications, including budgets	
Documents used to prepare the Item 21 description of services attachment	

PURCHASE AND DELIVERY OF SERVICES	
Library	Service Provider
All documents related to the purchase and delivery of E-rate eligible services and equipment	All documents related to the purchase, sale and delivery of E-rate eligible services and equipment
Purchase requisitions	Any other applicable documents listed for the library
Purchase orders	
Packing slips	
Delivery, installation and warranty records showing where equipment was delivered and installed or where services were provided	

INVOICING	
Library	Service Provider
All Invoices	All Invoices and associated billing records
Records proving payment of the invoice such as the following listed items:	Records showing invoice payment by beneficiary to the service provider
• Accounts payable records	USAC payment to the service provider
• Service provider statement	Payment of the BEAR to the beneficiary, through receipt or deposit records, bank statements, beneficiary check or automated clearing house (ACH) transaction
• Beneficiary check	
• ACH transaction record	
• Bank Statements	
Proof of service provider payment to the library of the BEAR (Form 472), if applicable	

INVENTORY	
Library	Service Provider
Asset and inventory records of equipment purchased and components of supported internal connections services sufficient to verify the location of such equipment	
Detailed records documenting any transfer of equipment within three years after purchase and the reasons for such a transfer	

FORMS AND RULE COMPLIANCE	
Library	Service Provider
All official notification records from USAC	All official notification records from USAC
FCC Form 470 printout	FCC Form 470
FCC Form 470 Certification pages with signature (if not certified electronically)	FCC Form 474
FCC Form 471 printout	FCC Form 498
FCC Form 471 certification pages with signature (if not certified electronically)	Service check documents
FCC Form 471 Item 21 attachments	
FCC Form 479 (copy of form sent to MOREnet (and CIPA Compliance form if filing for any non-MOREnet service—in MO this is with the Technology Plan documents)	
FCC Form 486 (Services confirmed)	
FCC Form 500 (Modification to Receipt of Service Confirmation—returns \$\$ not spent back to the fund)	
FCC Form 472 (BEAR—reimbursement form, filed quarterly is recommended)	
Any documents submitted to USAC during program integrity (PIA) review	
Any documents submitted to USAC during Invoicing Review	
Any documentation related to Service Provider Identification Number (SPIN) change requests (or other SPIN requests)	
Any documentation submitted to USAC related to other requests, e.g. service substitutions, extensions, etc.	
Documents to provide compliance with other program rules, e.g. records relevant to show CIPA compliance	
Documents showing “Proof of Postmark” for all submissions	

*FCC's Fifth Order: "Although we agree with commenters that an explicit list of documents that must be retained in the recordkeeping requirement would be most useful for service providers and program beneficiaries, we do not believe that an exhaustive list is possible. ...To address commenter's concerns, however, we provide for illustrative purposes the following description of documents that service providers and program beneficiaries must retain pursuant to this recordkeeping requirement..."

RULE: 47 CFR 54.516: Auditing

(a) Recordkeeping Requirements.

- a. Schools and libraries. Schools and libraries shall retain all documents related to the application for, receipt, and delivery of discounted telecommunications and other supported services for at least 5 years after the last day of service delivered in a particular Funding Year. Any other document that demonstrates compliance with the statutory or regulatory requirements for the schools and libraries mechanism shall be retained as well. Schools and libraries shall maintain assets and inventory records of equipment purchased as components of supported internal connections services sufficient to verify the actual location of such equipment for a period of five years after purchase.
- b. Service Providers. Service providers shall retain documents related to the delivery of discounted telecommunications and other supported services for at least 5 years after the last day of the delivery of discounted services. Any other document that demonstrates compliance with the statutory or regulatory requirements for the schools and libraries mechanism shall be retained as well.

(b) Production of records. Schools, libraries, and service providers shall produce such records at the request of any representative (including any auditor) appointed by a state education department, the Administrator, the FCC, or any local, state or federal agency with jurisdiction over the entity.

(c) Audits. Schools, libraries, and service providers shall be subject to audits and other investigations to evaluate their compliance with the statutory and regulatory requirements for the schools and libraries universal service support mechanism, including those requirements pertaining to what services and products are purchased, what services and products are delivered, and how services and products are being used. Schools and libraries receiving discounted services must provide consent before a service provider releases confidential information to the auditor, reviewer, or other representative.